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12 **UNITED STATES DISTRICT COURT**  
**FOR THE DISTRICT OF NEVADA**

13 **UNITED STATES OF AMERICA, )**

14                              **Plaintiff,**

15                              **} Case No. 2:15-cr-0070-RFB**

16                              **v.**

17                              **CHANDAN MANANSINGH,**

18                              **Defendant.**

19 **STIPULATION TO CONTINUE REVOCATION HEARING**

20 Pursuant to Federal Rules of Criminal Procedure (“FRCP”) 32.1(b)(2) and 45(b), the  
21 parties respectfully request that the Court continue the upcoming hearing pertaining to revocation  
22 of Defendant’s supervised release. In support of this stipulation, the parties rely upon the  
23 following:

24         1. Under FRCP 32.1, a revocation hearing is required within a “reasonable” time.  
25 Currently, Defendant’s supervised release hearing is scheduled for May 26, 2016 at 1:30 p.m.

26         2. Counsel for the parties having discussed this matter are in agreement that the  
revocation hearing currently scheduled for this Thursday should be continued for several reasons.  
First, counsel for Defendant is busy preparing for a sentencing hearing in another matter, United  
States v. Robert Radin, 2:13-cr-0118-JCM-CWH, currently scheduled for May 26, 2016 at 10  
a.m. Secondly, government counsel is presently in trial in the matter of United States v. Charles

1     Cooper, 2:14-cr-0228-JAD-CWH which commenced on May 23, 2016 and is expected to last the  
2     full week. Because of these case schedules, counsel for the respective parties will not be able to  
3     devote the time necessary to fully preparing for the upcoming revocation hearing. Thirdly, and  
4     most importantly, the parties are discussing a potential resolution of this case in connection with  
5     recent charges filed against Mr. Manansingh in United States v. Manansingh, 2:16-cr-0140-JCM-  
6     VCF. Trial in that matter is scheduled to commence on July 11, 2016.

7       3.     In light of the foregoing, and in order to permit the parties sufficient time to  
8 potentially resolve this case (as well as Defendant's other pending charges), the parties  
9 respectfully request that the Court continue the current revocation hearing in this case to and until  
10 a date no earlier than August 1, 2016. The parties are in agreement that a continuance of the  
11 revocation hearing for the reasons set forth in this stipulation to and until a date after August 1,  
12 2016 would be "reasonable" within the meaning of FRCP 32.1.

13       4.     Counsel for Defendant has discussed this matter with his client, Mr. Manansingh,  
14 who has indicated that he concurs with this stipulation.

15 In light of the foregoing, the parties respectfully request that the Court approve this  
16 stipulation and continue the revocation hearing to a date no earlier than August 1, 2016.

Respectfully submitted,

/s/ Phillip N. Smith

/s/ Paul S. Padda

Phillip N. Smith, Esq.  
Assistant United States Attorney  
  
Counsel for the United States  
  
Dated: May 24, 2016

Paul S. Padda, Esq.

1                   **IT IS SO ORDERED:**

2                   The parties' stipulation for continuance of the  
3                   supervised release revocation hearing in United States  
4                   v. Chandan Manansingh, 2:15-cr-0070-RFB, is hereby  
                 approved. The hearing currently scheduled for May 26,  
                 2016 is hereby continued to the following date and time:

5                   **Date:** Wednesday, August 3, 2016

6                   **Time:** 10:00 AM, LV Courtroom 7C



7                   **RICHARD F. BOULWARE, II**  
8                   **UNITED STATES DISTRICT JUDGE**

9                   **Dated:** May 25th, 2016

11                  **CERTIFICATE OF SERVICE**

12                  In compliance with the Court's Local Rules, the undersigned hereby certifies that on May  
13                  24, 2016 a copy of the foregoing document, "STIPULATION TO CONTINUE REVOCATION  
14                  HEARING" was served (via the Court's CM/ECF system) upon all parties and counsel of record  
in this matter.

15                  /s/ *Paul S. Padda*

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17                  Paul S. Padda, Esq.